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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE META PIXEL TAX FILING CASES

Master File No. 5:22-cv-07557-PCP

This document relates to:

**DECLARATION OF NEAL DECKANT
IN SUPPORT OF STIPULATION AND
[PROPOSED] ORDER TO MODIFY
CLASS CERTIFICATION BRIEFING
DEADLINES**

All actions

[L.R. 6-2]

1 I, Neal Deckant, declare as follows:

2 1. I am an attorney at Bursor & Fisher, P.A. and I am Plaintiffs' Counsel in this action.
3 I make this Declaration in support of the concurrently-filed Stipulation and [Proposed] Order to
4 Modify Class Certification Briefing Deadlines. I have personal knowledge of all matters set forth
5 herein unless otherwise indicated, and, if called upon to testify, I could and would competently do
6 so.

7 2. Both parties have agreed that further time for discovery is required before briefing
8 begins on class certification.

9 3. The parties have had numerous potential discovery disputes related to the scope of
10 written discovery requests, search terms, and ESI sources, and as a result of time and efforts
11 invested in negotiations, they have so far been able to resolve the issues without the Court's
12 intervention. In light of the time invested in these negotiations, however, the parties have agreed
13 that they now require more time to complete document productions, depositions, and expert
14 analysis necessary for class certification briefing.

15 4. Although the parties disagree regarding the amount of additional time warranted,
16 they have reached a compromise, as set forth in the concurrently filed stipulation.

17 5. There have been no prior requests to alter the class certification deadline.

18 6. The Court has not set any deadlines other than for class certification briefing, and so
19 granting this request will have no other effect on the schedule for the case. Accordingly, the
20 parties jointly ask the Court to modify the current deadlines according to the new dates set forth
21 above.

22 I declare under penalty of perjury that the above and foregoing is true and accurate.

23 Executed on September 6, 2024 in Walnut Creek, CA.

24 /s/ Neal J. Deckant
25 Neal J. Deckant
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